

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**PROPOSED DEFENDANT-INTERVENORS’
MOTION TO STAY PROCEEDINGS PENDING APPEAL**

Consistent with the Notice of Appeal filed July 13, 2015 (Docket No. 60), and for the reasons set forth more fully in the accompanying memorandum, Proposed Defendant-Intervenors M.B., K.C., Y.D., G.E., A.G., I.G., R.H., J.L., R.S., Sarah Cole, Fadhal Moore, Arjini Kumari Nawal, Itzel Libertad Vasquez-Rodriguez, and Keyanna Wigglesworth (“the Students”) respectfully move to stay this litigation while the First Circuit resolves whether they have the right to intervene as parties to this case. The Students additionally support Harvard’s Motion to Stay proceedings while the Supreme Court decides *Fisher v. University of Texas at Austin*, No. 14-981(*Fisher II*) (Docket No. 58) because that stay would largely overlap with a stay pending appeal.

Respectfully submitted,

Dated: August 5, 2015

/s/ Priya A. Lane
Priya A. Lane, BBO # 688499

LAWYERS' COMMITTEE FOR CIVIL
RIGHTS AND ECONOMIC JUSTICE
294 Washington St. Suite 443
Boston, MA 02108
Tel: (617) 988-0608
plane@lawyerscom.org

Jon M. Greenbaum
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW
1401 New York Avenue, NW, Suite 400
Washington, DC 20005
Tel: (202) 662-8600

Lawrence E. Culleen
Steven L. Mayer
Nancy L. Perkins
ARNOLD & PORTER, LLP
555 12th Street, NW
Washington, D.C. 20004
Tel: (202) 942-5000

ATTORNEYS FOR PROPOSED
DEFENDANT-INTERVENORS

CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a), I hereby certify that I conferred in good faith with counsel for Plaintiff and Defendant in connection with this motion and have been unable to resolve or narrow the issues presented by this motion.

/s/ Jon M. Greenbaum
Jon M. Greenbaum

CERTIFICATE OF SERVICE

In accordance with Local Rule 5.2(b), I hereby certify that this document filed through the ECF system on August 5, 2015 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Priya A. Lane
Priya A. Lane